Ritter
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February 6, 2009

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

RE: EB Docket No. 06-36

Dear Ms. Dortch:

Enclosed you will find the CPNI certification filings of E. Ritter Communications Holdings, Inc. on behalf of its wholly-owned subsidiaries; E. Ritter Telephone Company, E. Ritter Communications, Inc. and Tri-County Telephone Company.

If there are any questions regarding this filing, I can be contacted at 870*-336-235 or jstrode@rittermail.com.

Sincerely,

RITTER COMMUNICATIONS HOLDINGS, INC.

John Strode
Vice President

cc: FCC Enforcement Bureau
       Best Copy and Printing

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E. RITTER COMMUNICATIONS HOLDINGS, INC.
P. O. Box 17040, Jonesboro, Arkansas 72403   870-336-2345

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date signed: February 6, 2009

Names of Companies Covered by this Certification:	499 Filer ID
E. Ritter Telephone Company	806856
E. Ritter Communications, Inc.	822588
Tri-County Telephone Company, Inc.	807843

Name of signatory: Mr. John Strode

Title of signatory: Vice President

I, John Strode, certify that I am an officer of the affiliated companies named above (collectively and individually "Company", and acting as an agent of the Company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission ("Commission"). See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in 2008 or related to 2008. The Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has not had to take any actions against data brokers. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.

John D. Strode
Vice President

Attachment

1

E. RITTER COMMUNICATIONS HOLDINGS, INC.

E. Ritter Telephone Company   499 Filer ID 806856
E. Ritter Communications, Inc.   499 Filer ID 822588
Tri-County Telephone Company, Inc. 499 Filer ID 807843

P. O. Box 17040, Jonesboro, Arkansas 72403   870-336-2345

2008 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE
February 6, 2009

This statement serves to explain how E. Ritter Telephone Company, E. Ritter Communications, Inc., and Tri-County Telephone Company, Inc. (collectively and individually "Company"), are complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2000-2011).

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

As of this date, the Company has not used or made plans to use CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any disaggregation or refinement based on CPNI

1.   Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

2.   Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3.   Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI **not** requiring customer authorization under Section 64.2005.

4.   Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

5. Customer Notification and Authorization Process

The Company does not use CPNI for marketing and thus, at this time, has not provided notice regarding Opt-Out. Prior to any planned use of CPNI for marketing, the Company will initiate the notification and Opt-Out process. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process. The Company has trained employees regarding prohibitions on use of CPNI for marketing. Prior to initiation of any program for use of CPNI for marketing, the Company will train employees with a need and/or responsibility for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008.

6. Record of Customer CPNI Approval/Non-Approval

At such time as Company may initiate use of CPNI for marketing with corresponding launch of a notification and Opt-Out process, the Company will develop and utilize a system for maintaining a readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

7. Procedures Protecting Against Disclosure of CPNI

During 2008, the Company had procedures in place for compliance with Section 64.2010 including, but not limited to the following:

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company provides customers with on-line access to customer account information for which the Company has initiated procedures to control access in compliance with Section 64.20101(c) comprising authentication through a password established in compliance with Section 64.2010(e).

The Company has implemented password back-up authentication procedures in compliance with Section 64.2010(e).

The Company has implemented procedures to notify customers of account changes.

8. Actions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

Not applicable.   No actions taken against data-brokers.
No customer complaints received.

9. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

10. Supervisory Review Process for Outbound Marketing

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.

11. Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.